

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

RICHARD J. ISOLDE, Individually And On
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

TRINITY INDUSTRIES, INC., TIMOTHY R.
WALLACE, AND JAMES E. PERRY,

Defendants.

Case No. 3:15-cv-2093

Judge Ed Kinkeade

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING
THE APPOINTMENT OF LEAD PLAINTIFF AND CO-LEAD COUNSEL**

Lead Plaintiff Movants the Department of the Treasury of the State of New Jersey and its Division of Investment (“New Jersey”); and Plumbers and Pipefitters National Pension Fund and United Association Local Union Officers & Employees Pension Fund (the “Pension Funds”), by and through their undersigned counsel, bring this motion seeking the Court’s approval of this stipulated agreement and Proposed Order.

The undersigned counsel, on behalf of New Jersey and the Pension Funds, hereby stipulate and agree to the following:

1. WHEREAS, on June 29, 2015, pursuant to Section 21D(a)(3)(A) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(A), as amended by the PSLRA, three movants filed motions seeking appointment as Lead Plaintiff in the above-captioned action: (1) New Jersey; (2) the Pension Funds; and (3) City of Austin Police Retirement System (“City of Austin”);

2. WHEREAS, on July 7, 2015, City of Austin withdrew its motion;

3. WHEREAS, the motions of New Jersey and the Pension Funds are the only two motions seeking Lead Plaintiff status pending before the Court;

4. WHEREAS, on March 1, 2016, the Court held a conference on the pending Lead Plaintiff motions;

5. WHEREAS, pursuant to the Court’s directive at the March 1 conference, counsel for New Jersey and the Pension Funds have met and conferred regarding the pending motions;

NOW THEREFORE, SUBJECT TO THIS COURT’S APPROVAL, NEW JERSEY AND THE PENSION FUNDS STIPULATE AND AGREE AS FOLLOWS:

1. New Jersey and the Pension Funds agree to work together to represent the Class as Lead Plaintiff of the Class;

2. New Jersey and the Pension Funds agree that New Jersey's chosen counsel, Lowenstein Sandler LLP and Bernstein Litowitz Berger & Grossmann LLP, and the Pension Funds' chosen counsel, Robbins Geller Rudman & Dowd LLP, will serve as Co-Lead Counsel for the Class;

3. New Jersey and the Pension Funds agree that the Kendall Law Group, LLP and Jackson Walker L.L.P will serve as Co-Liaison Counsel for the Class.

DATED: March 3, 2016

Respectfully Submitted,

/s/ Joe Kendall

Joe Kendall
Texas State Bar No. 11260700
Jamie J. McKey
Texas State Bar No. 24045262
KENDALL LAW GROUP, LLP
3232 McKinney Avenue, Suite 700
Dallas, TX 75204
Telephone: (214) 744-3000
Facsimile: (214) 744-3015
jkendall@kendalllawgroup.com
jmckey@kendalllawgroup.com

/s/ David Folsom

David Folsom
Texas State Bar No. 07210800
Charles L. Babcock
Texas State Bar No. 01479500
David T. Moran
Texas State Bar No. 14419400
JACKSON WALKER LLP
KPMG Plaza at Hall Arts
2323 Ross Avenue, Suite 600
Dallas, TX 75201
Telephone: (214) 953.6000
Facsimile: (214) 953.5822
dfolsom@jw.com
dmoran@jw.com

Proposed Co-Liaison counsel for the Class

(Admitted *Pro Hac Vice*)

Michael B. Himmel

New Jersey State Bar No. 016241981

Michael T.G. Long

New Jersey State Bar No. 29622004

LOWENSTEIN SANDLER LLP

65 Livingston Avenue

Roseland, New Jersey 07068

Telephone: (973) 597-2500

Facsimile: (973) 597-2400

mhimmel@lowenstein.com

mlong@lowenstein.com

(Admitted *Pro Hac Vice*)

Gerald H. Silk

New York State Bar No. 2764140

Avi Josefson

New York State Bar No. 4149407

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

1285 Avenue of the Americas

New York, New York 10019

Telephone: (212) 554-1400

Facsimile: (212) 554-1444

jerry@blbglaw.com

avi@blbglaw.com

*Counsel for the Department of the Treasury of
the State of New Jersey and its Division of
Investment and Proposed Co-Lead Counsel
for the Class*

Darren J. Robbins (Admitted *Pro Hac Vice*)

Nathan R. Lindell (Admitted *Pro Hac Vice*)

**ROBBINS GELLER RUDMAN &
DOWD LLP**

655 West Broadway, Suite 1900

San Diego, CA 92101-8498

Telephone: (619) 231-1058

Facsimile: (619) 231-7423

darrenr@rgrdlaw.com

nlindell@rgrdlaw.com

*Counsel for the Pension Funds and Proposed
Co-Lead Counsel for the Class*

ACCORDINGLY, IT IS HEREBY ORDERED THAT:

1. New Jersey and the Pension Funds are **APPOINTED** to serve as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995, in the above-captioned consolidated action.

2. Lead Plaintiff's choice of Co-Lead Counsel is **APPROVED**, and Lowenstein Sandler LLP, Bernstein Litowitz Berger & Grossmann LLP, and Robbins Geller Rudman & Dowd LLP are **APPOINTED** as Co-Lead Counsel for the Class.

3. Lead Plaintiff's choice of Co-Liaison Counsel is **APPROVED**, and the Kendall Law Group, LLP and Jackson Walker L.L.P. are **APPOINTED** as Co-Liaison Counsel for the Class.

Dated: _____, 2016

HON. ED KINKEADE
UNITED STATES DISTRICT JUDGE